

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS RICHARD PATELUNAS
(OCA/USPS-T5-13-17)
(July 24, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

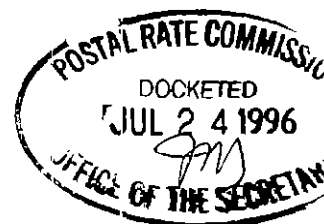
Respectfully submitted,

Gail Willette

GAIL WILLETTE
Director
Office of the Consumer Advocate

Shelley Dreifuss

SHELLEY DREIFUSS
Attorney



OCA/USPS-T5-13. Pages 14-17 of SSR-90 document the IOCS sampling system. Please provide more complete documentation of this sample including:

- a. The number of offices in sample and in the universe for each CAG.
- b. The sampling rate and effective sample size for each stratum, by craft.
- c. Description of any changes to the sample design or estimation formulas since the FY 1993 IOCS sample.

OCA/USPS-T5-14. Please refer to page 15 of SSR-90 for a description of the first stage sampling units for the IOCS. This states, "All offices that were in CAG A or CAG B prior to FY 1992 and all Bulk Mail Centers, are included in the sample."

- a. Please confirm that this excludes CAG C offices that were not in sample in FY 1992 but advanced from CAG C to CAG A or B during FY 1993 or FY 1994. If you do not confirm, then please explain how CAG C (or lower) offices that advance to CAG B (or higher) would be represented.
- b. How many offices in CAGs C or lower advanced to CAG B or A since the sample for FY93 was drawn? Of these offices, how many were already in the IOCS office sample in FY 1993?

OCA/USPS-T5-15. Please provide a table similar to that provided as library reference E-34 in R87-1 that shows historic office advancements and relegation in CAG status for IOCS sample offices up to FY 1995.

OCA/USPS-T5-16. Refer to Exhibit USPS-T-5C, at page 16, concerning post office boxes.

- a. Please confirm that the amount \$531.8 million is the revenue for post office boxes without the revenue of caller service. If you do not confirm, please explain.
- b. Please provide the "Revenue" for post office boxes and caller service for FY 1995.
- c. Please confirm that the amount \$509.7 million is the total attributable cost of post office boxes without the attributable cost of caller service. If you do not confirm, please explain.
- d. Please provide the "Total attributable cost" of post office boxes and caller service for FY 1995.
- e. Please provide the "Revenue as a percent of attributable cost" for post office boxes and caller service for FY 1995.

OCA/USPS-T5-17. Refer to Exhibit USPS-T-5C, at page 16, concerning post office boxes.

- a. Please provide the "Revenue" for caller service for FY 1995.
- b. Please provide the "Total attributable cost" of caller service for FY 1995.
- c. Please provide the "Revenue as a percent of attributable cost" for caller service for FY 1995.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.


SHELLEY DREIFUSS
Attorney

Washington, D.C. 20268-0001
July 24, 1996